

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO
~~BANKRUPTCY COURT~~
DISTRICT**

**INRE:
THE FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD OF
PUERTO RICO AS
REPRESENTATIVE OF THE
COMMONWEALTH OF PUERTO
RICO, ET ALS
DEBTORS**

**PROMESA TITLE III
NUM. 17BK3283-RTS**

MOTION INFORMING THE HONORABLE COURT

Comes now the movant party Hiram Pérez-Soto Pro Se and respectfully alleges and prays to the Honorable Bankruptcy Judge as follows:

1. That we filed a motion in September 18, 2019. In the aforesaid motion we stated that we want this Honorable Court to lift the stay of the case 19-CV-1774. As we explained in that motion the case 19-CV-1266 and 19-CV-1774, the complaints in both of those cases arose from the same set of facts contained in the claims of the complaint filed in the Court of First Instance of Humacao HSCI2007-01040. This Honorable Court has already lifted the stay under certain conditions pertaining to the case 19-CV-1266. See docket entry number 7776 of this Honorable Bankruptcy Court dated August 22, 2019. The two cases, 19-CV-1266 and 19-CV-1774 has been consolidated

by orders of Judge Cerezo and Judge García Gregory. The reason for the consolidation is that both cases as before explained arose from the same facts contained in the complaint HSCI2007-01040. We respectfully believe there is no reason why the conditional order lifting the stay made by this Honorable Court on August 22, 2019 docket number 7776 should not be made applicable to the case 19-CV-1774.

2. It should be pointed out that we sent a letter dated September 26, 2019 to the legal representatives of the Oversight Board and the AAFA and to the lawyer of the Department of Justice, copy of that letter is being sent with this motion, copy of the order of consolidation by Judges Cerezo and García Gregory is also being sent. On October 1, 2019 attorneys of the Department of Justice Wandimar Burgos Vargas and Susana I. Peñagaricano Brown acknowledged my letter of September 26, 2019 and they stated that they had forwarded the aforesaid to the legal representatives of the Oversight Board and AAFA. I have received no answer of my letter of their position about the applicability of the order lifting the stay with condition in the case 19-CV-1266 to the case 19-CV-1774. Therefore I think it is reasonable to presume that there has been no opposition by the legal representatives of the Oversight Board and the AAFA for the lifting of the stay in the case 19-CV-1774 according to the conditions made in the order applicable to the case 19-

CV-1266, according to the order of the Honorable Bankruptcy Judge dated August 22, 2019 docket entry number 7776. We have complied with the case Management Procedure ordered by this Court as a certification as required by paragraph III.R. We also have complied with the order made this Court docket entry number 8731 dated September 23, 2019. We have communicated with the legal representatives of the Oversight Board and AAFA and with the lawyers of the Department of Justice inasmuch as we have received no opposition to the aforesaid lifting of the stay with conditions, we believe this Honorable Court should make applicable the lifting of the stay with conditions made in the case 19-CV-1266 to the case 19-CV-1774.

WHEREFORE, it is respectfully requested to this Honorable Court that inasmuch as we have complied with the Case Management Order we have communicated with the representatives of the Oversight Board and AAFA and the lawyers of the Department of Justice; they didn't notify any opposition to our request. We believe it would be correct since we have complied with the Case Management Order that the same order lifting the stay with condition docket entry 7776 August 22, 2019 made applicable to the case 19-CV-1266 will be made applicable to the case 19-CV-1774.

I hereby certify that I sent copy of this motion the attorney of the Secretary of Justice of Puerto Rico Wandimar Burgos Vargas, email; wburgos@justicia.pr.gov. To Melissa Masscheder Torres, lawyer of the Department of Justice of the Commonwealth of Puerto Rico, email; melissamasscheder@gmail.com. I also certify that under the eighth amendment noticed Case Management and Administrative Procedure; I notify Counsel of the Oversight Board Hermann Bauer hermann.bauer@oneillborges.com and Ubaldo M. Fernández Barrera ubaldo.fernandez@oneillborges.com; Counsel for AAFAF Diana M. Pérez dperez@omm.com, Luis C. Marini-Biaggi lmarini@mpmlawpr.com and Carolina Velaz-Rivero cvelaz@mpmlawpr.com; I also filed this motion with the Clerk of the Federal Court in order for them to notify the master list and the claims and noticing agents, see Section E of the Case Management Proceedings.

In San Juan, Puerto Rico, October 18, 2019

H R S

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